## THE PARK LAW GROUP, LLC

Attorneys for Plaintiff
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## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

## EASYTEX CORPORATION LIMITED,

Plaintiff,

v.

PETER & FRANK OF NY, CORP., CHUL KYU KIM a/k/a KIM CHUL KYU a/k/a CHUK CHUL KIM a/k/a ROBERT CHUL KIM a/k/a CHUL KYOO KIM a/k/a CHUL KYOO KIM a/k/a KIM K. CHUL, BARO SHIPPING CO., LTD., TOP TEN TRANS, INC., GFA, INC., 3 WIN INC., MERCURY, AMERICAN INTERNATIONAL LINE, INC., SOON CHAN HONG a/k/a SOON C. HONG a/k/a SOON CHAN HONG a/k/a CHAN S. HONG a/k/a HONG S. CHAN a/k/a HONG SOON CHANG d/b/a SOONCHAN HONG CUSTOM HOUSE BROKER, STOP & STOR, jointly and severally.

Defendants.

Civil Action No. 07-CV-03907 (BSJ) (JCF)

## **ECF CASE**

CERTIFICATE OF HYUN SUK CHOI, ESQ. IN SUPPORT OF PLAINTIFF'S APPLICATION FOR CLERK'S CERTIFICATE OF DEFAULT AGAINST DEFENDANT CHUL KYU KIM a/k/a KIM CHUL KYU a/k/a CHUK CHUL KIM a/k/a ROBERT CHUL KIM a/k/a CHUL KYOO KIM a/k/a CHULKYOO KIM a/k/a KIM K. CHUL

Hyun Suk Choi hereby certifies that:

- 1. I am a member of the Bar of this Court and am associated with The Park Law Group, LLC, attorneys for Plaintiff Easytex Corporation Limited ("Plaintiff") in this action.
  - 2. I am familiar with all the facts and circumstances in this action.

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3. I make this Certificate pursuant to Rule 55(a) of Federal Rules of Civil Procedure and

Rule 55.1 of the Local Civil Rules for the Southern District of New York, in support of Plaintiff's

application for Clerk's Certificate of Defendant Chul Kyu Kim a/k/a Kim Chul Kyu a/k/a Chuk Chul

Kim a/k/a Robert Chul Kim a/k/a Chul Kyoo Kim a/k/a Chulkyoo Kim a/k/a Kim K. Chul

("Defendant").

4. On May 18, 2007, Plaintiff commenced this action by filing a summons and complaint

against numerous defendants in this action.

5. On June 29, 2007, Defendant filed an Answer and Counterclaim ("Answer").

6. On January 11, 2008, counsel for Defendant filed a Motion to Withdraw as Attorney with

the Court ("the Motion").

7. On January 22, 2008, the Court granted the Motion. A true and correct copy of the Order

concerning the Motion ("the Order") is attached as Exhibit A.

8. In the Order, the Court ordered Defendant to appear by new counsel or pro se by

February 22, 2008. See id.

9. Defendant has not complied with the Order to date.

10. The Order further states that Defendant's failure to comply with the Order will result in

entry of judgment by default against Defendant. See id.

11. A proposed form of Clerk's Certificate of Default against Defendant is attached as

Exhibit B.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and

correct.

Dated: April 21, 2008

Hyun Suk Choi, Esq. (HC4208)

Attorney for Plaintiff

**Easytex Corporation Limited** 

10298\_4

2